2

3

4 5

6

7

8

9

10

11

13 14

12

1516

17

18

19

20

2122

23

24

2526

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RICHARD BRADDOCK,

Plaintiff,

v.

ZAYCON FOODS, LLC, a Washington limited liability company; FRANK R. MARESCA, JANE DOE MARESCA and the marital community composed thereof; MICHAEL GIUNTA, JANE DOE GIUNTA and the marital community composed thereof; MIKE CONRAD, JANE DOE CONRAD and the marital community composed thereof; and ADAM KREMIN, JANE DOE KREMIN and the marital community composed thereof,

Defendants.

NO. 2:16-cv-1756

STIPULATED MOTION AND ORDER EXTENDING BRIEFING DEADLINE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT FILED DECEMBER 21, 2017

STIPULATION AND PROPOSED ORDER

All parties, through their respective counsel undersigned, stipulate as follows:

- 1. Defendants filed a motion for summary judgment on December 21, 2017.
- 2. The motion is returnable as noted on the motion calendar on January 12, 2018.
- 3. The parties hereby stipulate and agree that the motion shall be adjourned for one week to be returnable and noted on the motion calendar on January 19, 2018.
 - 4. The parties further stipulate and agree that Plaintiff's pending Motion to

STIPULATED MOTION AND ORDER EXTENDING BRIEFING DEADLINE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT FILED DECEMBER 21, 2017 - 1



1	Extend Briefing Schedule should be resolved solely on the basis of the substantive arguments
2	made therein, and that Plaintiff withdraws his argument made in support of that motion that
3	Defendants' filing of their summary judgment motion on December 21 was an attempt to take
4	advantage of the holiday season.
5	
6	DATED this 8th3rd day of January, 2018.
7	By <u>/s/ David L. Tift</u>
8	David L. Tift, WSBA #13213
9	Michael Jay Brown, WSBA #9224 RYAN, SWANSON & CLEVELAND, PLLC
10	1201 Third Avenue, Suite 3400 Seattle, Washington 98101-3034
	Telephone: (206) 464-4224
11	Facsimile: (206) 583-0359 brown@ryanlaw.com
12	tift@ryanlaw.com
13	David G. Trachtenberg, NYSB #1671023
14	Leonard A. Rodes, NYSB #1927144 Trachtenberg Rodes & Friedberg LLP
15	545 Fifth Avenue, Suite 640 New York, New York 10017
16	Phone: 212-972-2929
17	Fax: 212-972-7581 Email: dtrachtenberg@trflaw.com
18	Attorneys for RICHARD BRADDOCK
19	
20	By /s/ Elizabeth Yingling
21	Elizabeth Yingling, TXBA #16935975
22	(admitted Pro Hac Vice) BAKER & MCKENZIE LLP
23	2001 Ross Avenue, Ste. 2300 Dallas, TX 75201
24	Telephone: (214) 978-3039
25	Elizabeth.yingling@bakermckenzie.com
26	



By /s/ Heidi B. Bradley

Heidi B. Bradley, WSBA #35759 Genevieve York-Erwin, WSBA #49820

LANE POWELL PC
1420 Fifth Avenue, Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402
Phone: (206) 223-7437
Fax: (206) 223-7107
yorkerwing@lanepowell.com
bradleyh@lanepowell.com
Attorneys for Defendants ZAYCON
FOODS, LLC, MICHAEL GIUNTA,

JANE DOE GIUNTA

By /s/ Geana M. Van Dessel
Geana M. Van Dessel, WSBA #35969
LEE & HAYES, PLLC
601 W. Riverside Ave., Ste. 1400
Spokane, WA 99201
Telephone: (509) 944-4639
Fax: (509) 323-8979
Geana V@leehayes.com
Attorney for Defendants FRANK R.
MARESCA, JANE DOE MARESCA,
MIKE CONRAD, JANE DOE CONRAD,
ADAM KREMIN and JANE DOE
KREMIN

STIPULATED MOTION AND ORDER EXTENDING BRIEFING DEADLINE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT FILED DECEMBER 21, 2017 - 3



PROPOSED ORDER 2 The Court, having reviewed the stipulation of the parties, RENOTES defendants' Motion for Partial Summary Judgment, docket no. 50, to January 19, 2018. DATED this 8th day of January, 2018. 4 5 homes 5 3 6 Thomas S. Zilly 7 United States District Judge 8 Presented by: RYAN SWANSON & CLEVELAND, PLLC 10 By /s/ David L. Tift 11 David L. Tift, WSBA #13213 12 Michael Jay Brown, WSBA #9224 RYAN, SWANSON & CLEVELAND, PLLC 13 1201 Third Avenue, Suite 3400 Seattle, Washington 98101-3034 14 Telephone: (206) 464-4224 Facsimile: (206) 583-0359 15 brown@ryanlaw.com 16 tift@ryanlaw.com 17 David G. Trachtenberg, NYSB #1671023 Leonard A. Rodes, NYSB #1927144 18 Trachtenberg Rodes & Friedberg LLP 545 Fifth Avenue, Suite 640 19 New York, New York 10017 20 Phone: 212-972-2929 Fax: 212-972-7581 21 dtrachtenberg@trflaw.com lrodes@trflaw.com 22 Attorneys for RICHARD BRADDOCK 23 24 By /s/ Elizabeth Yingling Elizabeth Yingling, TXBA #16935975 25 (admitted Pro Hac Vice) **BAKER & MCKENZIE LLP** 26

STIPULATED MOTION AND ORDER EXTENDING BRIEFING DEADLINE OF DEFENDANTS' MOTION FOR SUMMARY

JUDGMENT FILED DECEMBER 21, 2017 - 4

1	2001 Ross Avenue, Ste. 2300
2	Dallas, TX 75201 Telephone: (214) 978-3039
3	Elizabeth.yingling@bakermckenzie.com
4	
5	By <u>/s/ Heidi B. Bradley</u>
6	Heidi B. Bradley, WSBA #35759 Genevieve York-Erwin, WSBA #49820
7	LANE POWELL PC
8	1420 Fifth Avenue, Suite 4200 P.O. Box 91302
9	Seattle, WA 98111-9402
10	Phone: (206) 223-7437 Fax: (206) 223-7107
11	yorkerwing@lanepowell.com bradleyh@lanepowell.com
12	Attorneys for Defendants ZAYCON FOODS,
13	LLC, MICHAEL GIUNTA, JANE DOE GIUNTA
14	
15	By /s/ Geana M. Van Dessel
16	Geana M. Van Dessel, WSBA #35969 LEE & HAYES, PLLC
17	601 W. Riverside Ave., Ste. 1400
18	Spokane, WA 99201 Telephone: (509) 944-4639
19	Fax: (509) 323-8979 GeanaV@leehayes.com
20	Attorney for Defendants FRANK R.
21	MARESCA, JANE DOE MARESCA, MIKE CONRAD, JANE DOE CONRAD, ADAM
22	KREMIN and JANE DOE KREMIN
23	
24	
25	



26